

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

Jointly Administered

**JOINDER OF THE STATE OF ARIZONA TO THE OBJECTION OF THE UNITED
STATES TRUSTEE TO MOTION OF DEBTORS FOR ENTRY OF ORDER
AUTHORIZING (I) DEBTORS TO (A) PAY PRE-PETITION WAGES, SALARIES,
EMPLOYEE BENEFITS AND OTHER COMPENSATION AND (B) MAINTAIN
EMPLOYEE BENEFIT PROGRAMS AND PAY RELATED ADMINISTRATIVE
OBLIGATIONS, (II) EMPLOYEES AND RETIREES TO PROCEED WITH
OUTSTANDING WORKERS' COMPENSATION CLAIMS AND (III) FINANCIAL
INSITUTITONS TO HONOR AND PROCESS RELATED CHECKS AND TRANSFERS**

The State of Arizona, *ex rel.* Attorney General Mark Brnovich (the “State of Arizona”), joins in the Objection of William K. Harrington, the United States Trustee for Region 2 (the “United States Trustee”), to the Debtors’ Motion (the “Debtor’s Motion”) for Entry of an Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation, and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers’ Compensation

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Claims, and (III) Financial Institutions to Honor and Process Related Checks and Transfers (the “Objection”). ECF Doc. No. 134.

Debtors’ dangerous oxycodone-based opioids have taken a tragic toll on the nation and on Arizona. Hundreds of deaths each year in Arizona are attributable to prescription opioids, including Debtors’ products. These deaths are a part of what has become a national opioid crisis. Debtors engaged in a well-documented array of illegal practices in order to sell more pills and reap astronomical profits. Debtors alone made billions of dollars pushing powerfully addictive drugs on unsuspecting doctors and patients.

The employees who were responsible for or directly involved in the wrongdoing should not be rewarded with bonuses, whether styled as annual incentive plans, sign-on bonuses, or severance payments. Yet the Debtors’ Motion provides little to no detail regarding which employees would receive these payments, or whether those employees participated in the illegal practices resulting in the opioid epidemic. The United States Trustee’s Objection demanding that Debtors make additional disclosures to satisfy the requirements of Bankruptcy Code Section 503(c) is clearly appropriate. Before allocating tens of millions of dollars of estate funds that could otherwise be used to ameliorate the ravages of the opioid epidemic, Debtors owe this diligence to the Creditors who have suffered at their hands.

The State of Arizona joins in the assertions and arguments made in the Objection, and for the reasons set forth therein, submits that the Court should deny the approval of the portions of the Wage Motion detailed in the Objection and grant such other relief as the Court deems fair and just.

Respectfully submitted,

Dated: October 3, 2019

By: /s/ Seth A. Meyer

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CERTIFICATE OF SERVICE

The undersigned certifies that on October 3, 2019, he caused a true copy of the foregoing *Joinder of the State of Arizona to the United States Trustee's Objection to the Debtors' Motion for Entry of an Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation, and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims, and (III) Financial Institutions to Honor and Process Related Checks and Transfers* to be served electronically upon all parties in interest registered to receive notice through the Court's CM/ECF System.

/s/ Seth A. Meyer

Seth A. Meyer